

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

HEATHER RHIANNON MORGAN (AKA:
Razzlekhan),

Defendant.

**Application for
Order of Continuance**

22 Mag. 1280

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss.
SOUTHERN DISTRICT OF NEW YORK)

MAGGIE LYNAUGH, pursuant to 28 U.S.C. §1746, hereby affirms the truth of
the following under penalties of perjury:

1. I am an Assistant United States Attorney in the United States Attorney's
Office for the Southern District of New York. I submit this affirmation in support of an application
for an order of continuance of the preliminary hearing date set in this matter.

2. The defendant was charged in a complaint, dated February 7, 2022, out of
the United States District Court for the District of Columbia with violating Title 18 United States
Code, Sections 1956(h) (money laundering conspiracy), and 371 (conspiracy to defraud the United
States). On February 8, 2022, the defendant was arrested in New York and presented in a Rule
5(c)(3) proceeding before Magistrate Judge Debra Freeman, who released the defendant
principally on a \$3,000,000 bond co-signed by two financially responsible persons, and partially
secured by her parents' residence. The Government appealed that grant of bail to Chief Judge
Howell of the United States District Court for the District of Columbia. Chief Judge Howell
affirmed Magistrate Judge Freeman's bail decision.

3. The defendant is being represented by Anirudh Bansal, Esq. and Samson

Enzer, Esq., of Cahill Gordon & Reindel LLP.

4. A preliminary hearing is presently set for February 22, 2022 in this Court.

5. The Government and defense counsel are engaged in discussions concerning a possible disposition of this matter, and do not anticipate a resolution before the February 22, 2022 preliminary hearing date.

6. Therefore, the Government is requesting a 30-day continuance until March 24, 2022 for the preliminary hearing in order to continue the foregoing discussions. Defense counsel consented to this request by email on February 17, 2022.

7. A motion is pending before the United States District Court for the District of Columbia addressing issues under the Speedy Trial Act.

Dated: New York, New York
February 18, 2022



MAGGIE LYNAUGH
Assistant United States Attorney
(212) 637-2448

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Upon the application of the United States of America and the affirmation of Maggie Lynaugh, Assistant United States Attorney for the Southern District of New York, it is found that the defendant was charged with violating Title 18 United States Code, Sections 1956(h) (money laundering conspiracy), and 371 (conspiracy to defraud the United States) in a complaint, dated February 7, 2022, out of the United States District Court for the District of Columbia, and was arrested on February 8, 2022;

It is further found that on February 8, 2022, the defendant was presented in a Rule 5(c)(3) proceeding before Magistrate Judge Debra Freeman, who released the defendant principally on a \$3,000,000 bond co-signed by two financially responsible persons, and partially secured by her parents' residence;

It is further found that the Government appealed that grant of bail to Chief Judge Howell of the United States District Court for the District of Columbia, and that Judge Howell affirmed Magistrate Judge Freeman's bail decision;

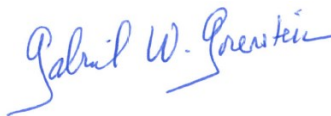
It is further found that Anirudh Bansal, Esq. and Samson Enzer, Esq., counsel for the defendant, have been engaged in, and are continuing, discussions concerning a possible disposition of this case with the Government;

It is further found that the Government has requested a continuance of 30 days for the preliminary hearing to engage in further discussions with counsel about the disposition of this case and that the defendant, through counsel, has consented that such a continuance may be granted for that purpose; and

It is further found that a motion is pending before the United States District Court for the District of Columbia addressing issues under the Speedy Trial Act; and therefore it is

ORDERED that the request for a continuance of the preliminary hearing date is hereby granted until March 24, 2022, and that a copy of this Order and the affirmation of Assistant United States Attorney Maggie Lynaugh be served by email on defense counsel by the United States Attorney's Office.

Dated: New York, New York
February 22, 2022

A handwritten signature in blue ink, reading "Gabriel W. Gorenstein".

United States Magistrate Judge
Southern District of New York